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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 FIDELITY NATIONAL TITLE GROUP,  
14 INC.; CHICAGO TITLE INSURANCE  
15 COMPANY; TICOR TITLE OF NEVADA,  
16 INC.,

Defendants.

Case No.: 3:20-cv-00046-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
DEFENDANTS' MOTIONS TO DISMISS  
SECOND AMENDED COMPLAINT  
[ECF Nos. 82, 83 & 84]**

**(First Request)**

17 Plaintiff, Bank of America, N.A. ("BANA"), and Defendants, Fidelity National Title  
18 Group, Inc. ("Fidelity"); Chicago Title Insurance Company ("Chicago Title"); and Ticor Title of  
19 Nevada, Inc. ("Ticor") (collectively, the "Defendants" and with BANA, the "Parties), by and  
20 through their counsel of record, hereby stipulate and agree as follows:

- 21 1. On November 17, 2022, BANA filed its Second Amended Complaint [ECF No. 72];
- 22 2. On March 6, 2023, Defendants filed their respective Motions to Dismiss [ECF No. 82, 83  
23 & 84];
- 24 3. BANA's deadline to respond to Defendants' Motions to Dismiss is currently March 20,  
25 2023;
- 26 4. BANA's counsel is requesting a brief one-week extension until Monday, March 27, 2023,  
27 to file its response to the pending Motions to Dismiss;
- 28

- 1        5. This extension is requested to allow counsel for BANA additional time to review and  
2        respond to the points and authorities cited to in the pending Motions;  
3        6. Counsel for Defendants does not oppose the requested extension;  
4        7. This is the first request for an extension which is made in good faith and not for purposes  
5        of delay.

6        **IT IS SO STIPULATED.**

7        DATED this 20<sup>th</sup> day of March, 2023.

DATED this 20<sup>th</sup> day of March, 2023.

8        WRIGHT, FINLAY & ZAK, LLP  
9

SINCLAIR BRAUN LLP

10        /s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Defendants*

16        **IT IS SO ORDERED.**

17        Dated this 21st day of March, 2023.

18        

19        \_\_\_\_\_  
20        UNITED STATES DISTRICT COURT JUDGE